

## Appendix C

### Site Inspection Checklist

**Appendix C Table C-1****Site Inspection Team Roster***Site Inspection- June 13, 2003, MGM Brakes Superfund Site Five-Year Review*

<b>Name</b>	<b>Title</b>	<b>Affiliation</b>
Janet Rosati	Remedial Project Manager	US Environmental Protection Agency Region IX
Derby Davidson, P.E.	Project Engineer	Erler & Kalinowski, Inc.
Harry Ohlendorf, PhD	Senior Technologist (Risk Assessment)	CH2M HILL Sacramento Office
Caroline Ziegler	Project Manager	CH2M HILL Oakland Office

**Five-Year Review Site Inspection Checklist  
MGM Brakes Superfund Site**

I. SITE INFORMATION											
<b>Site name:</b> MGM Brakes Superfund Site	<b>Date of inspection:</b> June 13, 2003										
<b>Location and Region:</b> Cloverdale, Sonoma County, CA, Region IX	<b>EPA ID:</b> CAD000074120 <b>Site ID:</b> 0946										
<b>Agency, office, or company leading the five-year review:</b> EPA Region IX	<b>Weather/temperature:</b> Clear, sunny, 90°F										
<b>Remedy Includes:</b> (Check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Landfill cover/containment  <input checked="" type="checkbox"/> Access controls  <input checked="" type="checkbox"/> Institutional controls  <input type="checkbox"/> Groundwater pump and treatment  <input type="checkbox"/> Surface water collection and treatment  <input checked="" type="checkbox"/> Other: Excavation and disposal of PCB contaminated soils and demolished building materials.             </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> Monitored natural attenuation  <input type="checkbox"/> Groundwater containment  <input type="checkbox"/> Vertical barrier walls             </td> </tr> </table>			<input type="checkbox"/> Landfill cover/containment <input checked="" type="checkbox"/> Access controls <input checked="" type="checkbox"/> Institutional controls <input type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other: Excavation and disposal of PCB contaminated soils and demolished building materials.	<input checked="" type="checkbox"/> Monitored natural attenuation <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Vertical barrier walls							
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Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached [Figure 2 in report]											
II. INTERVIEWS (Check all that apply)											
No interviews conducted.											
<b>1. O&amp;M Site Manager</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Name</td> <td style="width: 30%;">Title</td> <td style="width: 30%;">Date</td> </tr> <tr> <td>Interviewed:</td> <td>Phone No:</td> <td></td> </tr> <tr> <td colspan="3">Problems, suggestions:</td> </tr> </table>			Name	Title	Date	Interviewed:	Phone No:		Problems, suggestions:		
Name	Title	Date									
Interviewed:	Phone No:										
Problems, suggestions:											
<b>2. O&amp;M staff</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Name</td> <td style="width: 30%;">Title</td> <td style="width: 30%;">Date</td> </tr> <tr> <td>Interviewed:</td> <td>Phone No:</td> <td></td> </tr> <tr> <td colspan="3">Problems, suggestions:</td> </tr> </table>			Name	Title	Date	Interviewed:	Phone No:		Problems, suggestions:		
Name	Title	Date									
Interviewed:	Phone No:										
Problems, suggestions:											

3.	<b>Local regulatory authorities and responsible agencies</b> (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply.																
Agency																	
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Problems; suggestions:																	
Agency																	
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Contact	Name	Title	Date	Phone No.													
Problems; suggestions:																	
4. <b>Other interviews</b> (optional):																	
<b>III. ONSITE DOCUMENTS AND RECORDS VERIFIED</b> (Check all that apply)																	
1. <b>O&amp;M Documents</b>																	
<table style="width: 100%; border: none;"> <tr> <td style="width: 45%;"><input type="checkbox"/> O&amp;M manual</td> <td style="width: 25%;"><input type="checkbox"/> Readily available</td> <td style="width: 30%;"><input type="checkbox"/> Up to date</td> </tr> <tr> <td><input type="checkbox"/> As-built drawings</td> <td><input type="checkbox"/> Readily available</td> <td><input type="checkbox"/> Up to date</td> </tr> <tr> <td><input type="checkbox"/> Maintenance logs</td> <td><input type="checkbox"/> Readily available</td> <td><input type="checkbox"/> Up to date</td> </tr> </table>		<input type="checkbox"/> O&M manual	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> As-built drawings	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> Maintenance logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date							
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<input type="checkbox"/> Maintenance logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date															
Remarks: <u>No documents kept onsite. The site is not in O&amp;M at this time and therefore does not require these documents..</u>																	
2. <b>Site-Specific Health and Safety Plan</b> <input checked="" type="checkbox"/> Readily available <input type="checkbox"/> Up to date																	
<input type="checkbox"/> Contingency plan/emergency response plan <input type="checkbox"/> Readily available <input type="checkbox"/> Up to date																	
Remarks: <u>The groundwater monitoring conducted per the Final VOC Groundwater Monitoring Plan (EKI 1995) follows the health and safety requirements stated in the RA Health and Safety Plan submitted to EPA on December 11, 1991.</u>																	
3. <b>O&amp;M and OSHA Training Records</b> <input checked="" type="checkbox"/> Readily available <input checked="" type="checkbox"/> Up to date <input type="checkbox"/> N/A																	
Remarks: <u>Ongoing activity at the site includes groundwater monitoring which is currently conducted twice per year by personnel from Erler &amp; Kalinowski, Inc. (EKI), consulting engineers and scientists. All personnel involved in collecting the groundwater samples are required to undergo health and safety training.</u>																	
4. <b>Permits and Service Agreements</b>																	
<table style="width: 100%; border: none;"> <tr> <td style="width: 45%;"><input type="checkbox"/> Air discharge permit</td> <td style="width: 25%;"><input type="checkbox"/> Readily available</td> <td style="width: 15%;"><input type="checkbox"/> Up to date</td> <td style="width: 15%;"><input checked="" type="checkbox"/> N/A</td> </tr> <tr> <td><input type="checkbox"/> Effluent discharge</td> <td><input type="checkbox"/> Readily available</td> <td><input type="checkbox"/> Up to date</td> <td><input checked="" type="checkbox"/> N/A</td> </tr> <tr> <td><input type="checkbox"/> Waste disposal, POTW</td> <td><input type="checkbox"/> Readily available</td> <td><input type="checkbox"/> Up to date</td> <td><input checked="" type="checkbox"/> N/A</td> </tr> <tr> <td><input type="checkbox"/> Other permits _____</td> <td><input type="checkbox"/> Readily available</td> <td><input type="checkbox"/> Up to date</td> <td><input checked="" type="checkbox"/> N/A</td> </tr> </table>		<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Effluent discharge	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Other permits _____	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
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<input type="checkbox"/> Other permits _____	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A														
Remarks: <u>There are no permits or service agreements.</u>																	

5. <b>Gas Generation Records</b>	_ Readily available	_ Up to date	<u>X</u> N/A
Remarks:			
6. <b>Settlement Monument Records</b>	_ Readily available	_ Up to date	<u>X</u> N/A
Remarks:			
7. <b>Groundwater Monitoring Records</b>	<u>X</u> Readily available	<u>X</u> Up to date	_ N/A
Remarks: <u>Current semi-annual and previous quarterly monitoring reports are prepared and submitted to EPA by EKI.</u>			
8. <b>Leachate Extraction Records</b>	_ Readily available	_ Up to date	<u>X</u> N/A
Remarks:			
9. <b>Discharge Compliance Records</b>			
_ Air	_ Readily available	_ Up to date	<u>X</u> N/A
_ Water (effluent)	_ Readily available	_ Up to date	
Remarks:			
10. <b>Daily Access/Security Logs</b>	_ Readily available	_ Up to date	<u>X</u> N/A
Remarks: <u>N/A. Site fenced and unattended.</u>			
<b>IV. O&amp;M COSTS</b>			
1. <b>O&amp;M Organization</b>			
_ State in-house	_ Contractor for State		
_ PRP in-house	_ Contractor for PRP		
_ Other	_ Contractor for USEPA		
Remarks: <u>O&amp;M Costs are not applicable. This site is undergoing long term remedial action (LTRA) and is not in O&amp;M.</u>			
2. <b>O&amp;M Cost Records</b>			
_ Readily available	_ Up to date		
_ Funding mechanism/agreement in place			
_ Original O&M cost estimate	_ Breakdown attached		
Total annual cost by year for review period if available.			
Date	Date	Total cost	
From _____	To _____	_____	_ Breakdown attached
Date	Date	Total cost	
From _____	To _____	_____	_ Breakdown attached
Date	Date	Total cost	
3. <b>Unanticipated or Unusually High O&amp;M Costs During Review Period</b>			
Describe costs and reasons:			
_____			
_____			
_____			
_____			

V. ACCESS AND INSTITUTIONAL CONTROLS <input checked="" type="checkbox"/> Applicable				
<b>A. Fencing</b>				
1.	<b>Fencing</b>	<input checked="" type="checkbox"/> Location shown on site map	<input checked="" type="checkbox"/> Gates secured	<input type="checkbox"/> N/A
Remarks: <u>A fence surrounds the MGM Brakes property. There are breaks in the fencing along the southeastern boundary where some construction is taking place on the neighboring property. All monitoring wells are off the MGM property and are not within a fenced area.</u>				
<b>B. Other Access Restrictions</b>				
1.	<b>Signs and other security measures</b>	<input type="checkbox"/> Signs Displayed		
Remarks: <u>The only sign posted at this site is a "For Sale" sign (see photo, Appendix D).</u>				
<b>C. Institutional Controls</b> There is a voluntary covenant agreement restricting land use in certain areas.				
1.	<b>Implementation and enforcement</b> Site conditions imply ICs not properly implemented <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Site conditions imply ICs not being fully enforced <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A  Type of monitoring (e.g., self-reporting, drive by) _____ Frequency _____ Responsible party/agency _____  Contact _____ <div style="display: flex; justify-content: space-between; width: 100%;"> <span>Name</span> <span>Title</span> <span>Date</span> <span>Phone No.</span> </div> Reporting is up to date <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Reports are verified by the lead agency <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A  Specific requirements in deed or decision documents have been met <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Violations have been reported <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Other problems or suggestions:                      Report attached			
2.	<b>Adequacy:</b> <input checked="" type="checkbox"/> ICs are adequate <input type="checkbox"/> ICs are inadequate <input type="checkbox"/> N/A  Remarks: <u>A conformed copy of the Covenant and Agreement to Restrict Use of Certain Property was recorded on July 12, 1995 in the official records of Sonoma County by TBG, Inc, the potentially responsible party (PRP).</u>			
<b>D. General</b>				
1.	<b>Vandalism/trespassing</b> <input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> No vandalism evident  Remarks: <u>Although no vandalism was evident, there is free access to the site at the southeastern property boundary where the fence has been dismantled due to construction being conducted at the neighboring property.</u>			
2.	<b>Land use changes onsite</b> <input checked="" type="checkbox"/> Yes  Remarks: <u>The site is a vacant lot which is currently for sale.</u>			

3. **Land use changes offsite** ☒ Yes

Remarks: A new office building and parking lot have been constructed within the parcel located to the south of the MGM Brakes property. Some of the groundwater monitoring wells are located on this property and could not be located at the time of the site inspection due to the new parking lot paving.

The wells were subsequently located and are in good condition.

**VI. GENERAL SITE CONDITIONS**

**A. Roads** ☒ Applicable

1. **Roads** ☒ Location shown on site map ☒ Roads adequate ☐ N/A  
Remarks: Residential public streets are located along the northeastern and northwestern property boundaries. These streets are South Cloverdale Blvd. (paved) and Donovan Road (gravel), respectively. Both roads are in good condition.

**B. Other Site Conditions**

Remarks: The site is an open field. It appeared to have been freshly mowed (see photo, Appendix D).

**VII. LANDFILL COVERS** Not Applicable ☒

**A. Landfill Surface**

1. **Settlement** (Low spots) ☐ Location shown on site map ☐ Settlement not evident  
Areal extent \_\_\_\_\_ Depth \_\_\_\_\_

Remarks:

2. **Cracks** ☐ Location shown on site map ☐ Cracking not evident  
Lengths \_\_\_\_\_ Widths \_\_\_\_\_ Depth \_\_\_\_\_

Remarks:

3. **Erosion** ☐ Location shown on site map ☐ Erosion not evident  
Areal extent \_\_\_\_\_ Depth \_\_\_\_\_

Remarks:

4. **Holes** ☐ Location shown on site map ☐ Holes not evident  
Areal extent \_\_\_\_\_ Depth \_\_\_\_\_

Remarks:

5. **Vegetative Cover** Grass ☐ Cover properly established ☐ No signs of stress  
Trees/Shrubs (indicate size and locations on a diagram)

Remarks:

6. **Alternative Cover** (armored rock, concrete, etc.) ☐ N/A

Remarks:

7.	<b>Bulges</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Bulges not evident
	Areal extent _____	Height _____	
	Remarks:		
8.	<b>Wet Area/Water Damage</b>	<input type="checkbox"/> Wet areas/water damage not evident	
	Wet areas	Location shown on site map	Areal extent _____
	Ponding	Location shown on site map	Areal extent _____
	Seeps	Location shown on site map	Areal extent _____
	Soft subgrade	Location shown on site map	Areal extent _____
	Remarks:		
9.	<b>Slope Instability</b>	Slides <input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of slope instability
	Areal extent _____		
	Remarks:		
<b>B. Benches</b> <span style="float: right;"><input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A</span> (Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)			
1.	<b>Flows Bypass Bench</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A or okay
	Remarks:		
2.	<b>Bench Breached</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A or okay
	Remarks:		
3.	Bench Overtopped	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> N/A or okay
	Remarks:		
<b>C. Letdown Channels</b> <span style="float: right;"><input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A</span> (Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)			
1.	<b>Settlement</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of settlement
	Areal extent _____	Depth _____	
	Remarks:		
2.	<b>Material Degradation</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of degradation
	Material type _____	Areal extent _____	
	Remarks:		
3.	<b>Erosion</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of erosion
	Areal extent _____	Depth _____	
	Remarks:		



4.	<b>Undercutting</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> No evidence of undercutting
	Areal extent_____	Depth_____	
	Remarks:		
5.	<b>Obstruction</b>	Type_____	<input type="checkbox"/> No obstruction
	Location shown on site map	Areal extent_____	
	Size_____		
	Remarks:		
6.	<b>Excessive Vegetative Growth</b>	Type _____	
	No evidence of excessive growth		
	Vegetation in channels does not obstruct flow		
	Location shown on site map	Areal extent_____	
	Remarks:		
<b>D. Cover Penetrations</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Gas Vents</b>	<input type="checkbox"/> Active	<input type="checkbox"/> Passive
	Properly secured/located	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled
	Evidence of leakage at penetration	<input type="checkbox"/> Good condition	
	Remarks:		
2.	<b>Gas Monitoring Probes</b>		
	Properly secured/located	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled
	Evidence of leakage at penetration	<input type="checkbox"/> Good condition	
	Remarks:		
3.	<b>Monitoring Wells</b> (within surface area of landfill)		
	Properly secured/located	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled
	Evidence of leakage at penetration	<input type="checkbox"/> Good condition	
	Remarks:		
4.	<b>Leachate Extraction Wells</b>		
	Properly secured/located	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled
	Evidence of leakage at penetration	<input type="checkbox"/> Needs O&M	<input type="checkbox"/> Good condition
			<input type="checkbox"/> N/A
	Remarks:		
5.	<b>Settlement Monuments</b>	<input type="checkbox"/> Located	<input type="checkbox"/> Routinely surveyed
	<input type="checkbox"/> N/A		
	Remarks:		
<b>E. Gas Collection and Treatment</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A

1.	<b>Gas Treatment Facilities</b>		
	<input type="checkbox"/> Flaring	<input type="checkbox"/> Thermal destruction	<input type="checkbox"/> Collection for reuse
	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs O&M	
	Remarks:		
2.	<b>Gas Collection Wells, Manifolds and Piping</b>		
	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs O&M	
	Remarks:		
3.	<b>Gas Treatment Facilities</b> (e.g., gas monitoring of adjacent homes or buildings)		
	<input type="checkbox"/> Good condition	<input type="checkbox"/> Needs O&M	<input type="checkbox"/> N/A
	Remarks:		
<b>F. Cover Drainage Layer</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Outlet Pipes Inspected</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
	Remarks:		
2.	<b>Outlet Rock Inspected</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
	Remarks:		
<b>G. Detention/Sedimentation Ponds</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Siltation</b> Areal extent _____	Depth _____	<input type="checkbox"/> N/A
	Siltation not evident		
	Remarks:		
2.	<b>Erosion</b> Areal extent _____	Depth _____	
	Erosion not evident		
	Remarks:		
3.	<b>Outlet Works</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
	Remarks:		
4.	<b>Dam</b>	<input type="checkbox"/> Functioning	<input type="checkbox"/> N/A
	Remarks:		
<b>H. Retaining Walls</b>		<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A
1.	<b>Deformations</b>	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Deformation not evident
	Horizontal displacement _____	Vertical displacement _____	
	Rotational displacement _____		
	Remarks:		
2.	Degradation	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Degradation not evident
	Remarks:		

<b>I. Perimeter Ditches/Off-Site Discharge</b> <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A			
1.	<b>Siltation</b>	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> Siltation not evident	
	Areal extent_____	Depth_____	
	Remarks:		
2.	<b>Vegetative Growth</b>	<input type="checkbox"/> Location shown on site map <input checked="" type="checkbox"/> N/A	
	Vegetation does not impede flow		
	Areal extent_____	Type_____	
	Remarks:		
3.	<b>Erosion</b>	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> Erosion not evident	
	Areal extent_____	Depth_____	
	Remarks:		
4.	<b>Discharge Structure</b>	<input type="checkbox"/> Functioning <input checked="" type="checkbox"/> N/A	
	Remarks:		
<b>VIII. VERTICAL BARRIER WALLS</b> <input checked="" type="checkbox"/> Not Applicable			
1.	<b>Settlement</b>	Location shown on site map    Settlement not evident	
	Areal extent_____	Depth_____	
	Remarks:		
2.	<b>Performance Monitoring</b>	Type of monitoring_____	
	Performance not monitored		
	Frequency_____	<input type="checkbox"/> Evidence of breaching	
	Head differential_____		
	Remarks:		
<b>IX. GROUNDWATER/SURFACE WATER REMEDIES</b> <input checked="" type="checkbox"/> Applicable			
<b>A. Groundwater Extraction Wells, Pumps, and Pipelines</b> <input checked="" type="checkbox"/> Not Applicable (Currently there are no extraction wells, only monitoring wells.)			
1.	<b>Pumps, Wellhead Plumbing, and Electrical</b>		
	<input type="checkbox"/> Good condition <input type="checkbox"/> All required wells located <input type="checkbox"/> Needs O&M <input checked="" type="checkbox"/> N/A		
	Remarks:		
2.	<b>Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances</b>		
	<input type="checkbox"/> Good condition <input type="checkbox"/> Needs O&M		
	Remarks:		
3.	<b>Spare Parts and Equipment</b>		
	<input type="checkbox"/> Readily available <input type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided		
	Remarks:		
<b>B. Surface Water Collection Structures, Pumps, and Pipelines</b> <input checked="" type="checkbox"/> N/A			

1.	<b>Collection Structures, Pumps, and Electrical</b> <input type="checkbox"/> Good condition <input type="checkbox"/> Needs O&M Remarks:
2.	<b>Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances</b> <input type="checkbox"/> Good condition <input type="checkbox"/> Needs O&M <input type="checkbox"/> N/A Remarks:
3.	<b>Spare Parts and Equipment</b> <input type="checkbox"/> Readily available <input type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided <input type="checkbox"/> N/A Remarks:
<b>C. Treatment System</b> <input checked="" type="checkbox"/> Not Applicable (Treatment is by natural attenuation.)	
1.	<b>Treatment Train</b> (Check components that apply) <input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input type="checkbox"/> Bioremediation <input type="checkbox"/> Air stripping <input type="checkbox"/> Carbon adsorbers Filters: <input type="checkbox"/> Additive (e.g., chelation agent, flocculent) <input type="checkbox"/> Good condition <input type="checkbox"/> Needs O&M <input type="checkbox"/> Sampling ports properly marked and functional <input type="checkbox"/> Sampling/maintenance log displayed and up to date <input type="checkbox"/> Equipment properly identified <input type="checkbox"/> Quantity of groundwater treated annually <input type="checkbox"/> Quantity of surface water treated annually Remarks:
2.	<b>Electrical Enclosures and Panels</b> (properly rated and functional) <input type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Needs O&M Remarks:
3.	<b>Tanks, Vaults, Storage Vessels</b> Remarks: <u>No tanks, vaults or storage vessels onsite.</u>
4.	<b>Discharge Structure and Appurtenances</b> <input type="checkbox"/> Good condition <input type="checkbox"/> Needs O&M Remarks:
5.	<b>Treatment Building(s) – support building</b> <input type="checkbox"/> N/A <input type="checkbox"/> Good condition (especially roof and doorways) <input type="checkbox"/> Needs repair Remarks: <u>  </u>

6.	Monitoring Wells (pump and treatment remedy)
<input type="checkbox"/>	Properly secured/locked
<input type="checkbox"/>	Functioning
<input type="checkbox"/>	Routinely sampled
<input type="checkbox"/>	Good condition
<input type="checkbox"/>	All required wells located - no
<input type="checkbox"/>	Needs O&M
<input type="checkbox"/>	N/A
Remarks:	
<b>D. Monitored Natural Attenuation</b> <input checked="" type="checkbox"/> Applicable	
1.	Monitoring Wells (natural attenuation remedy)
<input checked="" type="checkbox"/>	Properly secured/locked
<input checked="" type="checkbox"/>	Functioning
<input checked="" type="checkbox"/>	Routinely sampled
<input checked="" type="checkbox"/>	Good condition
<input type="checkbox"/>	All required wells located- No
<input type="checkbox"/>	Needs O&M
Remarks: Some of the wells (B-71-1, B-75 and B-76) were difficult to locate due to the construction on the adjacent property located to the southeast. Of the wells observed, they appeared to be in good working condition. The last sampling event was conducted in March 2003 with no report of issues relative to the wells. The results from the last monitoring event are documented in the April 2003 semi-annual monitoring report. Wells B-71-1, B-75 and B-76 were subsequently located and are in good condition.	
<b>X. OTHER REMEDIES</b> N/A	
If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.	
<b>XI. OVERALL OBSERVATIONS</b>	
<b>A. Implementation of the Remedy</b>	
Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).	
<p><u>The remedial action for soil is complete. The remedial action for groundwater is monitored natural attenuation which requires semi-annual groundwater sampling for volatile organic compounds at eleven wells. None of the wells are within the physical site boundary of the property. They are all clustered toward the east/southeast. During the time of the site inspection, it was noted that new construction of an office building had taken place on the south side of the MGM Brakes property. Three monitoring wells located on this property were difficult to find due to new asphalt paving for a parking lot. In addition, some of the fencing was down along the southern MGM property line, also due to the new construction.</u></p>	

<b>B. Adequacy of O&amp;M</b>
<p>Describe issues and observations related to the implementation and scope of O&amp;M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p><u>This site is undergoing LTRA. There are no O&amp;M processes in place at this time.</u></p>
<b>C. Early Indicators of Potential Remedy Failure</b>
<p>Describe issues and observations such as unexpected changes in the cost or scope of O&amp;M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.</p> <p><u>TCE concentrations continue to decline. There are no indicators of potential remedy failure at this time.</u></p>
<b>D. Opportunities for Optimization</b>
<p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p><u>None noted at this time.</u></p>